

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

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In the Matter of )

Global NAPs, Inc. )

Petition for Arbitration Pursuant to Section 252(b)  
of the Telecommunications Act of 1996 to  
Establish an Interconnection Agreement with  
Verizon New England Inc. d/b/a Verizon  
Massachusetts f/k/a New England Telephone and  
Telegraph Company d/b/a Bell Atlantic-Massachusetts )

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D.T.E. 02-45

**SECOND STIPULATION OF ISSUES**

**Background**

On July 30, 2002, Global NAPs, Inc. ("Global") filed for arbitration to resolve issues arising during negotiations of an interconnection agreement with Verizon New England Inc., d/b/a Verizon Massachusetts ("Verizon"). Global identified nine issues in its arbitration petition and Verizon identified three additional issues in its response to the arbitration petition. On September 10, 2002, Verizon and GNAPs filed their First Stipulation of Issues noting that they had reached conceptual agreement on one of the issues contained in GNAPs' arbitration petition but had yet to reach agreement on contract language to implement that agreement. Since filing the First Stipulation of Issues the parties have not reached additional agreements and the status of issues remains as it was on September 10, 2002. Thus, the remaining eleven issues and the contract language to implement the agreed issue are unresolved and are as follows:

## **Agreement**

### **A. RESOLVED ISSUE**

#### **1. Issue 1 (Single POI Per LATA):**

The Parties do not dispute that the Department rulings permit GNAPs to establish a single physical point of interconnection (POI) per LATA at specified technically feasible points within Verizon's network. However, the parties have not yet agreed to specific contract language embodying this principle. Each Party's proposed contract language on this Issue remains as reflected in Exhibit B to Verizon's Response to GNAPs' Arbitration Petition.

### **B. UNRESOLVED ISSUES**

The unresolved issues remain as follows: Issue 2 (Transport to IPs), Issue 3 (Local Calling Areas), Issue 4 (Virtual FX), Issue 5 (Change-in-law provision for the *ISP Remand Order*), Issue 6 (Two-Way Trunking), Issue 7 (Tariff References), Issue 8 (Insurance), Issue 9 (Audits), Issue 10 (Collocation), Issue 11 (Change of law), Issue 12 (Network Upgrades) and contract language to implement Issue 1 (One Physical Point of Interconnection Per LATA). Each Parties' proposed contract language with respect to these issues remains as reflected in its proposed agreement filed with GNAPs' Petition for Arbitration and Verizon's Response thereto.

VERIZON MASSACHUSETTS

By: \_\_\_\_\_  
Keefe B. Clemons, Attorney for Verizon Massachusetts

\_\_\_\_\_  
Date

GLOBAL NAPS, INC.

By: \_\_\_\_\_  
James R. J. Scheltema

\_\_\_\_\_  
Date